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     BJS Restaurants Operations Company
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8
                              UNITED STATES DISTRICT COURT
9
                                     DISTRICT OF NEVADA
10
     TERRI MOORE, an individual,
                                               2:20-cv-01965-ART-VCF
11
                                Plaintiff,
                                             ) STIPULATION AND ORDER TO
12
                                               CONTINUE DEADLINE FOR PROPOSED
                                               JOINT PRETRIAL ORDER FOR 30 DAYS
13
            VS.
14
     BJ'S RESTAURANTS OPERATIONS
     COMPANY; ROES I-X; and DOE
15
     CORPORATIONS I-X; inclusive,
16
                                Defendants.
17
18
            Plaintiff TERR MOORE ("Plaintiff"), by and through her attorney of record, Leslie
19
     Stovall, Esq. and Ross Moynihan, Esq. of the law firm STOVALL & ASSOCIATES, and Defendant
20
     BJ'S RESTAURANTS OPEARTIONS COMPANY ("Defendant"), by and through its attorneys
21
     of record, Jack P. Burden, Esq. and Jacquelyn Franco, Esq. of the law firm of BACKUS | BURDEN,
22
     hereby stipulate and agree to an extension of the deadline to file Proposed Joint Pretrial Order by
23
     thirty (30) days.
24
           The Proposed Joint Pretrial Order is currently due to the Court by June 5, 2023. The
25
     Parties attended a Judicial Settlement Conference on May 5, 2023, and have been in continued
26
     discussions regarding possible resolution of the case. The requested extension will allow the
27
     parties sufficient time to complete the discussions and/or prepare the Joint Pretrial Order.
28
            Pursuant to LR IA 6-1(b), the Parties hereby aver that this is the first extension requested
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1	as it relates to the Joint Pretrial Order. Moreover, pursuant to Local Rule 26-3, it is respectfully		
2	submitted the Parties' failure to request the instant extension prior to the filing deadline was the		
3	result of excusable neglect; specifically noting the failure to request the extension of was a mere		
4			
5	oversight by the Parties. <i>Bateman v. U.S. Postal Service</i> , 231 F.3d 1220 (9 th Cir. 2000). Further: 1)		
	there is no danger of prejudice as the extension is stipulated by the Parties; 2) a sixty (60) day		
6	extension will not impact a trial date because the same has not been scheduled; 3) the Parties are		
7	hopeful to attend a settlement conference within the requested extended period; and 4) the		
8	requested extension is made in good faith by both Parties. Pioneer Investment Services v.		
9	Brunswick Associate's, Ltd., 507 U.S. 380, 395 (1993).		
10	As such, the Parties stipulate and agree to jointly ask the Court to extend the deadline to		
11	submit the Proposed Joint Pretrial Order by 30 days to July 5, 2023.		
12	IT IS SO STIPULATED.		
13			
14	DATED this 5th day of June, 2023.	DATED this 5th day of June, 2023.	
15	STOVALL & ASSOCIATES	BACKUS BURDEN	
16	/s/ Ross Moynihan	/s/ Jacquelyn Franco	
17	Leslie Stovall, Esq. Nevada Bar No. 2566	Jack P. Burden, Esq. Nevada Bar No. 6918	
	Ross Moynihan, Esq.	Jacquelyn Franco, Esq.	
18	Nevada Bar No. 11848	Nevada Bar No. 13484	
19	2301 Palomino Lane	3050 South Durango Drive	
20	Las Vegas, Nevada 89107 Counsel for Plaintiff	Las Vegas, Nevada 89117 Counsel for Defendant	
20	Counsel for Humity Counsel for Defendant		
	<u>ORDER</u>		
22	IT IS HEREBY ORDERED that the Parties shall submit the Proposed Joint Pretrial Order by July 5, 2023. IT IS SO ORDERED. DATED: this5th day ofJune		
23			
24			
25			
26	·		
27		Contact	
28	Can		
	U	UNITED STATES MAGISTRATE JUDGE	